

BEFORE THE
Federal Communications Commission **RECEIVED**

WASHINGTON, D.C. 20554

AUG 22 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

Advanced Television Systems and)
Their Impact Upon The Existing)
Television Broadcast Service)

MM Docket No. 87-268

SUPPLEMENT TO PETITION FOR RECONSIDERATION

On June 13, 1997, McAlister Television Enterprises, Inc. ("McAlister"), licensee of Station KAMC(TV), channel 28, Lubbock, Texas, filed a Petition for Reconsideration of the Commission's Sixth Report and Order in MM Docket No. 87-268* with respect to the proposed allotment of DTV channel 27 for use by Station KAMC(TV). In the Petition, McAlister specifically noted its concern about the DTV power assigned by the Commission for the operation of KAMC(TV) on channel 27. McAlister also stated that a full analysis of the DTV allotment to Station KAMC(TV) could not be completed without access to the then-unavailable OET Bulletin No. 69.

By an Order released on July 2, 1997 (DA 97-1377), the Commission announced that parties that had filed petitions for reconsideration in MM Docket No. 87-268 could supplement their petitions based on information contained in the Commission's OET Bulletin No. 69, also released on July 2. Pursuant to the Order, McAlister hereby supplements its Petition with the attached Engineering Statement prepared by its engineering consulting firm, Cohen, Dippell and Everist, P.C. As set forth therein, based on an examination of OET Bulletin No. 69,

* FCC 97-115 (released April 21, 1997).

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McAlister's consultants have determined that the operation of Station KAMC on DTV channel 27 would cause harmful interference to the Station's NTSC signal on channel 28.

To eliminate the potential for adjacent DTV channel interference to NTSC channel 28, McAlister proposes to substitute DTV channel 46 for channel 27, Lubbock, Texas, in the DTV Table of Allotments. The attached Engineering Statement demonstrates that a DTV facility broadcasting on channel 46 can operate with power of 1000 kW.

In conclusion, McAlister respectfully requests the Commission to reconsider its allotment of DTV channel 27 to Lubbock, Texas, and to allot in its place DTV channel 46.

Respectfully submitted,

MCALISTER TELEVISION ENTERPRISES, INC.

By: John R. Wilner
John R. Wilner

Its Attorney
Bryan Cave LLP
700 Thirteenth Street, N.W.
Washington, DC 20005
(202) 508-6000

August 22, 1997

ENGINEERING STATEMENT
ON BEHALF OF
MCALISTER TV ENTERPRISES INC.
CONCERNING SUPPLEMENT
TO PETITION FOR RECONSIDERATION
MM DOCKET NO. 87-268

AUGUST 1997

COHEN, DIPPELL AND EVERIST, P.C.
CONSULTING ENGINEERS
RADIO AND TELEVISION
WASHINGTON, D.C.

COHEN, DIPPELL AND EVERIST, P. C.

City of Washington)
) ss
District of Columbia)

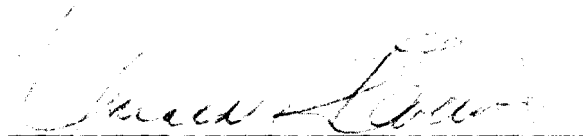
Donald G. Everist, being duly sworn upon his oath, deposes and states that:

He is a graduate electrical engineer, a Registered Professional Engineer in the District of Columbia, and is President of Cohen, Dippell and Everist, P.C., Consulting Engineers, Radio - Television, with offices at 1300 L Street, N.W., Suite 1100, Washington, D.C. 20005;

That his qualifications are a matter of record in the Federal Communications Commission;

That the attached engineering report was prepared by him or under his supervision and direction and

That the facts stated herein are true of his own knowledge, except such facts as are stated to be on information and belief, and as to such facts he believes them to be true.



Donald G. Everist
District of Columbia
Professional Engineer
Registration No. 5714

Subscribed and sworn to before me this 14 day of August, 1997.



Notary Public

My Commission Expires: SUE L KILGORE
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires December 14, 2001

This engineering statement has been prepared on behalf of McAlister TV Enterprises Inc., licensee of television station KAMC(TV), Lubbock, Texas. This further assessment is based upon examination of OET Bulletin No. 69 released July 2, 1997.

Station KAMC(TV) has been assigned a DTV channel adjacent to its NTSC Channel 28. Examination has been made of recent data¹ which, among other things, characterizes DTV out-of-band emissions generated by a non-linear final radio frequency (RF) amplifier. The data places in doubt the ability to generate, maintain, and receive a lower DTV first-adjacent channel operation which will not interfere with the KAMC(TV) NTSC signal.

A frequency search has been performed and it is found that the allocation situation will support a replacement DTV Channel 46 in lieu of the assigned DTV Channel 27. This channel has been selected after evaluation has been performed on alternate channels in both the VHF and UHF band following the methodology of OET Bulletin 69. The methodology uses the National Telecommunications and Information Administration Institute for Telecommunications Sciences ("ITS") computer and the Communication System Performance Model--Point-to-Point Irregular Terrain HDTV Model ("HDTV Model"). This HDTV model uses the Longley-Rice propagation methodology and evaluates in grid cell size 0.75-1.5 km with 3-second terrain data intervals between every 90 meters to 100 meters at one degree intervals.

¹"Transmitter Considerations for ATV", Robert J. Plonka, Harris Corp., Broadcast Division, November 22, 1996.

A study has been performed and a 1000 kW power level can be used. KAMC(TV) believes that 1000 kW will more closely replicate its existing NTSC service area. An allocation study for the proposed Channel 46 DTV to NTSC is shown in Table I. Table II reflects the allocation situation for the assigned Channel 27 DTV from MM Docket 87-268. Table III shows there are no proximate DTV allocations for either the requested channel or the assigned channel.

COHEN, DIPPELL AND EVERIST, P. C.

TABLE I
PROPOSED CHANNEL 46 DTV TO NTSC
ALLOCATION STUDY
AUGUST 1997

<u>Channel</u>	<u>Call</u>	<u>City/State</u>	<u>Distance</u>	
			<u>Actual</u> km	<u>Required</u> km
N	46	KAMC(TV) Lubbock, TX	--	--
N-15	31	None within 150 km	--	96.6
N-14	32	None within 150 km	--	96.6
N-8	38	None within 150 km	--	96.6
N-7	39	None within 150 km	--	96.6
N-4	42	None within 150 km	--	96.6
N-3	43	None within 150 km	--	96.6
N-2	44	None within 150 km	--	96.6
N-1	45	None within 150 km	--	88.5
N	46	None within 300 km	--	244.6
N + 1	47	None within 150 km	--	88.5
N + 2	48	None within 150 km	--	96.6
N + 3	59	None within 150 km	--	96.6
N + 4	50	None within 150 km	--	96.6
N + 7	53	None within 150 km	--	96.6
N + 8	54	None within 150 km	--	96.6

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TABLE II
DTV TO NTSC
FCC CHANNEL 27 ALLOCATION STUDY
AUGUST 1997

<u>Channel</u>	<u>Call</u>	<u>City/State</u>	<u>Distance</u>	
			<u>Actual</u> km	<u>Required</u> km
N	27	KAMC-DTV Lubbock, TX	--	--
N-8	19	None within 150 km	--	96.6
N-7	20	None within 150 km	--	96.6
N-4	23	None within 150 km	--	96.6
N-3	24	None within 150 km	--	96.6
N-2	25	None within 150 km	--	96.6
N-1	26	None within 150 km	--	88.5
N	27	KRPV Roswell, NM	252.9	244.6
N + 1	28	KAMC(TV) Lubbock, TX	0	≤ 9.7
N + 2	29	KHFT Hobbs, NM	145.8	96.6
N + 3	30	None within 150 km	--	96.6
N + 4	31	None within 150 km	--	96.6
N + 7	34	KJTV Lubbock, TX	2.7	≤ 24.1
N + 8	36	None within 150 km	--	96.6

COHEN, DIPPELL AND EVERIST, P. C.

TABLE III
DTV TO DTV
ALLOCATION STUDIES
AUGUST 1997

<u>Channel</u>	<u>Call</u>	<u>City/State</u>	<u>Distance</u>	
			<u>Actual</u> km	<u>Required</u> km
N	46	KAMC(DTV) Lubbock, TX	--	--
N-1	45	None within 150 km	--	88.5
N	46	None within 275 km	--	223.7
N + 1	47	None within 150 km	--	88.5

<u>Channel</u>	<u>Call</u>	<u>City/State</u>	<u>Distance</u>	
			<u>Actual</u> km	<u>Required</u> km
N	27	KAMC(DTV) Lubbock, TX	--	--
N-1	45	None within 150 km	--	88.5
N	46	None within 275 km	--	223.7
N + 1	47	None within 150 km	--	88.5